



# STATE OF CONNECTICUT

## DEPARTMENT OF ENVIRONMENTAL PROTECTION



Public Hearing: **March 11, 2009**  
Transportation Committee

Testimony Submitted by Commissioner Gina McCarthy  
Department of Environment Protection

### **House Bill No. 6647, AN ACT CONCERNING ON-BOARD DIAGNOSTIC EMISSION TESTING**

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Thank you for the opportunity to present testimony regarding Raised House Bill No. 6647, AN ACT CONCERNING ON-BOARD DIAGNOSTIC (OBD) EMISSION TESTING. The Department of Environmental Protection (DEP) does not support the bill as written. The proposed bill would result in increased air pollution, potentially delay Connecticut's efforts to attain the National Ambient Air Quality Standard (NAAQS) for ozone, and could violate regulations established by the U.S. Environmental Protection Agency (EPA) under the Clean Air Act (CAA).

All of Connecticut is currently in non-attainment for the health-based NAAQS for ozone. The I/M program is designed to identify vehicles that emit pollutants that exceed acceptable standards and require such vehicles to get repaired. The reductions resulting from this program are an integral part of DEP's air quality attainment efforts and important as part of a balanced strategy that includes reductions from stationary, area and mobile source sectors. The program, operating since 1983, has a long history of effectively reducing vehicle emissions, yielding more emission reductions than any other state implemented reduction strategy.

Because of the state's non-attainment status, EPA regulations require Connecticut to implement a motor vehicle inspection and maintenance (I/M) program in the state, which requires emissions testing of vehicles up to 20 years old. To maximize air quality benefits, Connecticut's current I/M program, which operates under the federally approved State Implementation Plan, requires all vehicles manufactured less than 25 years ago to be tested for emissions, except for vehicles less than four years old. The I/M program shows that frequently these older vehicles are found to need repairs to meet federal emission standards. By allowing pollution from older vehicles to continue unchecked, the air quality in the state would be negatively impacted and in addition, Connecticut would no longer be in compliance with EPA regulations.

Implementing this proposal would require a revision to the State Implementation Plan (SIP), and could greatly jeopardize Connecticut's ability to meet its emission reduction goals for current and future years as well as the State's ability to achieve attainment of the NAAQS. For EPA to approve any revisions to the current I/M program, the state must be able to demonstrate that the new program is as effective as the current program. Any I/M scenario resulting in decreased air quality benefits would have to be compensated by imposing greater restrictions on businesses, negatively impacting economic development. We want to avoid this as an unintended outcome. Thank you for the opportunity to present testimony on this proposal. If you should require any additional information, please contact Robert LaFrance, DEP's legislative liaison, at 424-3401.